

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: PHILLIP T. MAXWELL *aka* PHILLIP TODD MAXWELL
fdba THISTLEDOME HONEYSUCKLE SOCIETY and
JILL C. MAXWELL *aka* JILL COLLINS MAXWELL
fdba THISTLEDOME HONEYSUCKLE SOCIETY

DEBTOR(S)
CASE NO. 16-12068-JDW
CHAPTER 13
CREDITOR

FORD MOTOR CREDIT COMPANY LLC

MOTION FOR ADEQUATE PROTECTION

COMES NOW Ford Motor Credit Company LLC (FMCC), by counsel, and moves the Court
to order adequate protection payments as follows:

1. FMCC holds a secured claim covering a 2012 Ford Fusion vehicle bearing VIN
3FAHP0HA4CR128201.

2. Pursuant to 11 U. S. C. § 1326(a)(1)(C), Debtor(s) is to pay adequate protection
payments to FMCC beginning no later than thirty (30) days after the order for relief. Debtor(s) has
not paid and FMCC has not received adequate protection payments. Debtor(s) should be required
to pay adequate protection payments to FMCC.

WHEREFORE, FMCC moves the Court to order adequate protection payments as aforesaid;
and FMCC requests such other relief to which it may be entitled in the premises.

Respectfully submitted,

FORD MOTOR CREDIT COMPANY LLC

by: /s/Larry Spencer, Its Attorney

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JACKSON, MS 39205
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spencer@kingandspencer.net

CERTIFICATE OF SERVICE

I, Larry Spencer, Attorney for Ford Motor Credit Company LLC do hereby certify that I have this day caused to be served, via CM/ECF and/or United States Postal Service, a true and correct copy of the above and foregoing "Motion for Adequate Protection" to:

Robert H. Lomenick, Jr.
Rlomenick@gmail.com
ATTORNEY FOR DEBTOR(S)

Locke D. Barkley
sbeasley@barkley13.com
TRUSTEE

Henry G. Hobbs, Jr.
USTPRegion05.JA.ECF@usdoj.gov
U.S. TRUSTEE

SO CERTIFIED this the 8th day of July 2016.

/s/Larry Spencer

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